

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CLAUDE GRANT, individually and on behalf)	
of all others similarly situated,)	
)	NO. 3:18-cv-00666
Plaintiff,)	
)	JUDGE CRENSHAW
v.)	
)	MAGISTRATE JUDGE NEWBERN
METROPOLITAN GOVERNMENT OF)	
NASHVILLE AND DAVIDSON COUNTY,)	CLASS ACTION COMPLAINT
TENNESSEE,)	
)	
Defendant.)	

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RESPONSE
TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Comes Plaintiff and files this unopposed Motion to Extend Deadline to File Response to Defendant’s Motion for Summary Judgment. Plaintiff seeks an extension through March 6, 2020, for good cause shown below.

Defendant filed its Motion for Summary Judgment and related documents on January 10, 2020. *Docs. 29-31*. Per the Case Management Order, Plaintiff’s response is due on or before Friday, February 6, 2020.

Plaintiff’s counsel represents the defendant in a very large wage and hour class and collective action pending in the Western District of Arkansas involving over 15,000 class members, seeking damages in excess of \$60 million dollars. Since the filing of Defendant’s Motion for Summary Judgment, Plaintiff’s counsel has been required to devote virtually all of his time to this case. Plaintiff’s counsel has already spent several days in Arkansas since the filing of Defendant’s Motion, and is leaving again for Arkansas on February 2, 2020. With the exception of three days, Plaintiff’s

counsel will be in Arkansas the entire month of February in preparation for and participation in the multi-week trial, which is expected to last through the end of February.

Based on these constraints, it has and continues to be extremely difficult for Plaintiff's counsel to prepare a response to Defendant's Motion for Summary Judgment, which will be the situation through the end of February.

This case is not set for trial and there are no future deadlines beyond the briefing and resolution of Defendant's Motion for Summary Judgment.

Plaintiff's counsel has conferred with Defendant's counsel and there is no opposition to the Motion.

Based on the foregoing, Plaintiff requests an extension through March 6, 2020, to file his response to Defendant's Motion for Summary Judgment.

Respectfully submitted,

DICKINSON WRIGHT PLLC

By: s/ Martin D. Holmes

Martin D. Holmes, #12122
Fifth Third Center, Suite 800
424 Church Street
Nashville, TN 37219
(615) 244-6538
mdholmes@dickinsonwright.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2020, a true and exact copy of the foregoing has been served via the court's CM/ECF system to:

J. Brooks Fox, Esq.
Metropolitan Government of Nashville and Davidson County, Tennessee
Metropolitan Courthouse, Suite 108
P.O. Box 196300
Nashville, TN 37219

Attorneys for Defendant

s/ Martin D. Holmes

Martin D. Holmes

NASHVILLE 38509-2 721935v1